

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

EDWARD NOVAK,  
ROY PAYAWAL,  
VENKATESWARA R. KUCHIPUDI,  
PERCY CONRAD MAY, JR.; and  
SHANIN MOSHIRI

No. 13 CR 312

Magistrate Judge DANIEL G. MARTIN

MOTION FOR ENTRY OF AGREED  
PROTECTIVE ORDER GOVERNING DISCOVERY

Pursuant to Fed. R. Crim. P. 16(d) and 18 U.S.C. § 3771(a), the United States of America, by GARY S. SHAPIRO, United States Attorney for the Northern District of Illinois, moves for the entry of an agreed protective order, and in support thereof states as follows:

1. The complaint in this case charges defendants with having conspired to knowingly and willfully offer and pay, and solicit and receive, remunerations directly and indirectly, overtly and covertly, in return for the referral of patients for the furnishing and arranging for the furnishing of any item and service for which payment may be made in whole or in part under a Federal health care program, in violation of Title 42, United States Code, Section 1320a-7b(b), all in violation of Title 18, United States Code, Section 371.

2. The discovery to be provided by the government in this case includes sensitive information, whose unrestricted dissemination could adversely affect law enforcement interests and the privacy interests of third parties.

3. The government has discussed the proposed protective order with counsel for defendants, who agree to the entry of the proposed order.

WHEREFORE, the government respectfully moves this Court to enter the proposed protective order.

Respectfully submitted,

GARY S. SHAPIRO  
United States Attorney

By: /s/ Terra Reynolds  
TERRA REYNOLDS  
Assistant U.S. Attorney  
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Dated: May 28, 2013

**CERTIFICATE OF SERVICE**

The undersigned Assistant United States Attorney hereby certifies that in accordance with Fed. R. Crim. P. 49, Fed. R. Civ. P. 5, LR 5.5, and the General Order on Electronic Case Filing (ECF), the following document:

**MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER GOVERNING  
DISCOVERY**

was served pursuant to the district court's ECF system as to ECF filers on MAY 28, 2013.

/s/ Terra Reynolds

TERRA REYNOLDS

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